



**Bell Law Group, PLLC**

116 Jackson Avenue  
Syosset, New York 11791  
T (516) 280-3008  
F (516) 706-4692  
BellLG.com

May 18, 2025

*Via ECF*

Judge Katherine Polk Failla  
United States Courthouse  
Southern District of New York  
United States District Court  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: *Sanchez v. Clipper Realty, Inc., et al***  
Case No.: 1:21-cv-8502

Dear Judge Failla,

Please be advised that this firm represents the Defendants in the above captioned matter. I write in opposition to the Plaintiff's May 16, 2025 letter motion in which Plaintiff requests that the Court issue an order directing the Defendants to provide an updated collective list by June 2, 2025. [ECF No. 173]. Defendants oppose the Plaintiff's motion as the Court's May 15, 2025 order extended the Defendants' deadline to update the collective list to July 21, 2025 [ECF No. 172].

On May 14, 2025 this office requested a 60-day extension of all deadlines due to its substitution as counsel for the Defendants on May 14, 2025. [ECF No. 171]. Plaintiff's counsel consented to our request for a 60-day extension of all deadlines including the May 22, 2025 deadline for Defendants to provide an updated collective list. The Court granted our requested extensions. It is unclear why Plaintiff's counsel has reversed course and now seeks to modify the revised scheduling order to which they expressly agreed, in writing, just two days prior.

This office requested the extension because this case is document intensive and this office will need to spend time reviewing the defense file from prior counsel before engaging substantively. To date this office has received some, but not all, of Defendants' prior counsel's files. Accordingly, as we have not even received the entire file yet, an acceleration of the July 21, 2025 deadline will severely prejudice Defendants' ability to properly defend this case. Further, this office is closed for Memorial Day next Monday, a further limitation on our ability to comply with Plaintiff's proposed accelerated deadline.

By way of the foregoing, Defendants respectfully request that the Court deny Plaintiff's motion in its entirety. Rather, Defendants request that the Court maintain the deadlines set forth in its May 15, 2025 order [ECF 172].

Thank you for your attention to this matter.

Respectfully Submitted,  
BELL LAW GROUP, PLLC

*Paul Bartels*

---

Paul A. Bartels, Esq.  
[paul@belllg.com](mailto:paul@belllg.com)

cc: All Counsel of Record (via ECF)

The Court has reviewed Plaintiffs' request to modify the scheduling order that was filed on May 15, 2025, and Defendants' letter in opposition. (Dkt. #173, 174). Because it is undisputed that Plaintiffs consented to the request to extend *all* deadlines in this case, the Court declines to modify the scheduling order that was filed on May 15, 2025.

The Clerk of Court is directed to terminate the pending motion at docket entry 173.

Dated: May 19, 2025  
New York, New York

SO ORDERED.

*Katherine Polk Failla*

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE